



# The BURKE-PARSONS-BOWLBY Corporation

P.O. BOX 231 • RIPLEY, WEST VIRGINIA 25271 • PHONE: (304) 372-2211  
FAX: (304) 372-1211

PRESSURE TREATED  
WOOD PRODUCTS

July 24, 2006

Jeanna R. Henry (3WC31)  
Louis F. Ramalho (3RC30)  
RCRA Compliance and Enforcement Branch  
United States Environmental Protection Agency – Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

RE: In the matter of The Burke-Parsons-Bowlby Corporation  
Consent Agreement and Final Order Docket No. RCRA-03-2006-0037

The March 30, 2006 Consent Agreement (CA) and Final Order, Section III "Compliance Tasks", requires that The Burke-Parsons-Bowlby Corporation (BPB) install a curb on the northern perimeter of the drip pad in accordance with paragraph 80 of the CA.

## Compliance Certification:

*BPB has completed the installation of the curb as of July 24, 2006 which completes the curb around the entire perimeter of the drip pad in accordance with 9 VAC 20-60-264, which incorporates by reference 40 C.F.R. ' 264.573(a)(3).*

In accordance with paragraph 80 of the CA:

I certify that the information contained in or accompanying this compliance certification is true, accurate and complete. As to those identified portions (as italicized above) of this compliance certification for which I cannot personally verify their accuracy, I certify under penalty of law that this compliance certification and all attachments were prepared in accordance with a system designed to assure the qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature: 

Name: Richard E. Bowlby

Title: President, The Burke-Parsons-Bowlby Corporation

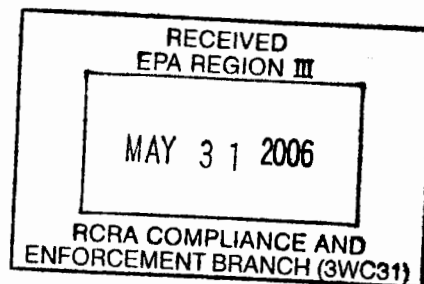
PLANT LOCATIONS: SPENCER, WV • GOSHEN, VA • STANTON, KY • DuBOIS, PA



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P.O. BOX 231 • RIPLEY, WEST VIRGINIA 25271 • PHONE: (304) 372-2211  
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PRESSURE TREATED  
WOOD PRODUCTS



May 23, 2006

Jeanna R. Henry (3WC31)  
Louis F. Ramalho (3RC30)  
RCRA Compliance and Enforcement Branch  
United States Environmental Protection Agency – Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

RE: In the matter of The Burke-Parsons-Bowlby Corporation  
Consent Agreement and Final Order Docket No. RCRA-03-2006-0037

The March 30, 2006 Consent Agreement (CA) and Final Order, Section III “Compliance Tasks”, requires that The Burke-Parsons-Bowlby Corporation (BPB) perform certain tasks “immediately upon the effective date of the CA” as set forth in paragraphs 76 through 79 and 81 through 83.

## **Compliance Certification:**

*BPB is storing hazardous wastes at the Facility in accordance with the generator accumulation requirements of 9 VAC 20-60-262, which incorporates by reference 40 C.F.R. 262.34, as required by paragraph 76 of the CA.*

*BPB keeps all hazardous waste containers closed during storage at the Facility in accordance with 9 VAC 20-60-262, which incorporates by reference 40 C.F.R. 265.173(a), as required by paragraph 77 of the CA.*

*BPB maintains the drip pad surface clean in a manner and frequency such that accumulated residues of hazardous waste or other materials are removed, with residues being properly managed as hazardous waste, so as to allow weekly inspections of the entire drip pad surface without interference or hindrance from accumulated residues of hazardous waste or other materials on the drip pad, in accordance with 9 VAC 20-60-264, which incorporates by reference 40 C.F.R. 264.573(i), as required by paragraph 78 of the CA.*



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*BPB operates and maintains the drip pad in a manner to minimize tracking of hazardous waste or hazardous waste constituents off the drip pad as a result of activities by personnel or equipment at the Facility, in accordance with 9 VAC 20-60-264, which incorporates by reference 40 C.F.R. 264.573(j), as required by paragraph 79 of the CA.*

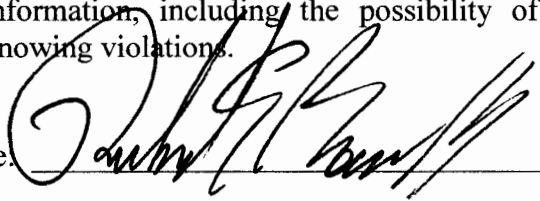
*BPB makes a hazardous waste determination on each waste generated at the Facility at the time the waste is generated, as required by 9 VAC 20-60-262, which incorporates by reference 40 CFR 262.11 as required by paragraph 81 of the CA.*

*BPB keeps all containers of universal waste lamps closed during storage at the Facility, and comply with all applicable storage requirements in accordance with 9 VAC 20-60-273, which incorporates by reference 40 C.F.R. 273-9, as required by paragraph 82 of the CA.*

*BPB is storing hazardous waste which are restricted from land disposal in accordance with the conditions for such storage as set forth in 9 VAC 20-60-268, which incorporates by reference 40 C.F.R. 268.50(a), as required by paragraph 83 of the CA.*

In accordance with paragraph 84 of the CA:

I certify that the information contained in or accompanying this compliance certification is true, accurate and complete. As to those identified portions (as italicized above) of this compliance certification for which I cannot personally verify their accuracy, I certify under penalty of law that this compliance certification and all attachments were prepared in accordance with a system designed to assure the qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

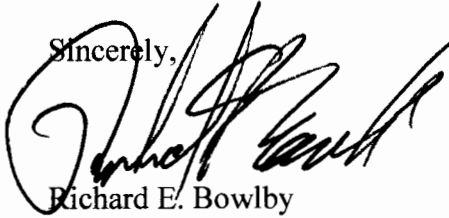
Signature. 

Name: Richard E. Bowlby

Title: President, The Burke-Parsons-Bowlby Corporation

In accordance with paragraph 80 of the CA, BPB intends to install the curb on the northern perimeter of the drip pad on or about July 25, 2006 to complete the curb around the entire perimeter of the drip pad. BPB will provide both notification and a certification of compliance when the drip pad curb is completed.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard E. Bowlby", written over the word "Sincerely,".

Richard E. Bowlby  
President